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Attorney for Defendant  
ISHU LAKRA

THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

NAVIN KHANNA, aka Lovin Khanna, TINU  
KHANNA, aka Gagan Khanna, DANIEL  
DOLAN, CHI MO, aka David Mo, WRIGHT  
LOUIS MOSLEY, ISHU LAKRA, TOU SUE  
VANG, ANDREW VANG, and MONICA  
MOUA,  
Defendants.

Case No.: 2:22-CR-0213 KJM

UNOPPOSED MOTION AND ORDER TO  
MODIFY CONDITIONS OF RELEASE TO  
ALLOW FOR TRAVEL

Judge: Hon. Kimberly J. Mueller

Defendant has been released on his own recognizance with the only travel restrictions being that he shall notify counsel of any travel outside the Eastern District of California or the Eastern District of North Carolina and to surrender his passport to United States District Court (Special Condition number five). Defendant respectfully requests permission to travel outside the United States sometime between March 15, 2024, and April 15, 2024, to New Delhi, India, to visit his elderly parents. The defendant further requests permission to possess his passport for up to one week before and after the trip as necessary to facilitate this travel.

On October 20, 2022, Ishu Lakra was indicted on one count of conspiracy to transport property interstate in violation of 18 U.S.C. § 371. He made arrangements to

1 travel from New Jersey and appear in court voluntarily for his initial appearance on  
2 December 19, 2022, and he was released on his own recognizance.

3 Mr. Lakra requests that his conditions of release be modified to state: “Your  
4 passport shall be released from the U.S. Clerk’s office to defense counsel on March 8,  
5 2024. You may travel to India any time between March 15, 2024, and remain there until  
6 any time up to April 15, 2024. You shall return to the United States (residence in North  
7 Carolina) no later than April 15, 2024. You are authorized to possess your U.S. Passport  
8 between March 8, 2024, and April 22, 2024. You shall return your passport to your  
9 attorney by April 22, 2024.”

10 The United States has indicated that it does not oppose this request.

11  
12 DATED: February 8, 2024

Respectfully submitted,

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15 /S/ Tamara Soloman  
16 TAMARA SOLOMAN  
17 Attorney for Defendant  
18 ISHU LAKRA

19 **ORDER**

20 **IT IS SO ORDERED.**

21 DATED: February 12, 2024.

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25 CHIEF UNITED STATES DISTRICT JUDGE  
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